

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STATE OF WASHINGTON,

Plaintiff,

v.

UNITED STATES OFFICE OF  
MANAGEMENT AND BUDGET, an agency  
of the United States of America,

Defendant.

Case No. 2:21-cv-00564-RSL

STIPULATED MOTION

The parties, by and through their counsel of record, hereby STIPULATE AND AGREE to the following:

1. This Court previously issued a Case Management Order, Dkt. # 12, in the above-captioned lawsuit brought under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, setting certain summary judgment deadlines, and providing that “[t]he parties may, however, file dispositive motions before the deadlines set in this order, in which case they shall be noted for consideration as specified in the Local Civil Rules.” Dkt. # 12 at 2.
2. Plaintiff filed a Motion for Summary Judgment, Dkt. # 13, before the deadline set in the Court’s Case Management Order to which Defendant filed an Opposition, and which is now fully briefed and pending this Court’s ruling.

3. At this time, the parties agree and jointly stipulate that this Court's ruling on the pending Summary Judgment Motion is likely to impact how this case moves forward and any potential future motions practice. Therefore, the parties jointly request that any further summary judgment briefing deadlines be extended until after this Court rules on the pending motion. Following this Court's ruling, the parties propose to meet and confer on any future briefing schedule, as necessary.

4. Based on the good cause identified above, and in order to try to conserve judicial resources, the parties agree and stipulate that there is good cause to extend the current summary judgment deadlines set forth in the Case Management Order, Dkt. # 12.

IT IS SO STIPULATED, THROUGH PARTIES OF RECORD.

DATED this 1st day of December, 2021.

NICHOLAS W. BROWN  
United States Attorney

ROBERT W. FERGUSON  
Attorney General

s/ Katie D. Fairchild  
KATIE D. FAIRCHILD, WSBA #47712  
Assistant United States Attorney  
United States Attorney's Office  
700 Stewart Street, Suite 5220  
Seattle, WA 98101-1271  
Phone: 206-553-4358  
Fax: 206-553-4067  
Email: katie.fairchild@usdoj.gov

*Attorneys for Defendant*

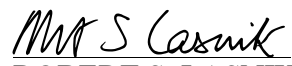
s/ Lauryn K. Fraas  
LAURYN K. FRAAS, WSBA #53238  
BRIAN H. ROWE, WSBA #56817  
NATHAN BAYS, WSBA # 43025  
Assistant Attorneys General  
Office of the Attorney General  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206)-464-7744  
Lauryn.Fraas@atg.wa.gov  
NathanBays@atg.wa.gov  
Brian.Rowe@atg.wa.gov

*Attorneys for Plaintiff*

**ORDER**

**IT IS SO ORDERED.** Within 14 days of the Court's ruling on the pending motion for summary judgment, the parties shall file a joint status report indicating whether additional motions practice is necessary and proposing a briefing schedule.

Dated this 2nd day of December, 2021.

  
ROBERT S. LASNIK  
United States District Judge